

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA                     )  
  )  
v.   ) Criminal No: 10CR10275DPW  
  )  
JOSE LUIS BAEZ                                     )  
  )

MOTION TO EXTEND FILING DEADLINE FOR DEFENDANT'S SUPPLEMENTAL  
MEMORANDUM OF LAW REGARDING MOTION TO SUPPRESS

Now comes the Defendant and respectfully requests that this Honorable Court extend the filing deadline for the Defendant's Supplemental Memorandum of Law Regarding the Defendant's Motion to Suppress, currently set for Friday, February 24, 2012, to Tuesday, February 28, 2012.

As reasons hereof, the Defendant states the following:

1. Attorney Murat Erkan and Attorney Michael P. Ruane represent the Defendant.
2. Counsel for the Defendant require additional time to research and respond to the Government's filings regarding the Defendant's Motion to Suppress.
3. Counsel for the Defendant assented to an extension of time for the Government to file its Supplemental Memorandum on or about February 10, 2012.
4. Attorney Michael P. Ruane sent an e-mail message to Assistant United States Attorney David Tobin requesting the within extension. Attorney Ruane has not yet heard back from

Assistant United States Attorney David Tobin regarding the same. Attorney Ruane does not expect Attorney Tobin to object to this request. Attorney Ruane, however, cannot say that Attorney Tobin assents to the same as of the time of filing the within Motion to Extend.

5. The interests of justice support the within extension of time. The Court has requested that the parties fully brief their respective positions such that the March 21, 2012 hearing date regarding this matter is efficient and productive. The Defendant requires a very short extension to accomplish this directive and goal.

Respectfully submitted,  
Jose Luis Baez,  
By and through his attorney,

/s/ Michael P. Ruane  
Michael P. Ruane, BBO: 641308  
300 High Street  
Andover, MA 01810  
(978) 475-6112

Dated: February 24, 2012

CERTIFICATE OF SERVICE

I, Attorney Michael P. Ruane, counsel for the Defendant, Manuel Lara, hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on December 14, 2010.

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/s/ Michael P. Ruane, Esquire

Date: February 24, 2012